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THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

9 TRENTON SMITH, individually and) Case No.: 8:25-cv-161-FWS-DFM
10 on behalf of all others similarly)
11 situated,) [Discovery Document: Referred to
12 Plaintiffs,) Magistrate Judge Douglas F.
13 vs.) McCormick]
14)
15 JOHN SHAHIDI, an individual;) [PROPOSED] ORDER
16 NELK, INC. dba NELK, FULL) GRANTING PLAINTIFFS'
17 SEND, a Canadian Company,) MOTION TO OVERRULE
18 METACARD, LLC, a Delaware) GENERAL AND BOILERPLATE
19 Limited Liability Company; NELK) OBJECTIONS, COMPEL
20 USA, INC., a Delaware Corporation;) FURTHER RESPONSES TO
21 KYLE FORGEARD, an individual.) DISCOVERY & ENTER
22) PROTECTIVE ORDER
23 Defendants.)
24) Hearing Date: Oct. 14, 2025
25) Time: 10:00 a.m.
26)
27) Discovery Cut Off: April 9, 2026
28) Pretrial Conference: Oct. 29, 2026
29) Trial Date: Nov. 17, 2026

PROPOSED ORDER

Having considered Plaintiffs' motion to compel further responses to interrogatories and requests for production without general objections or boilerplate objections, and a privilege log attorney for work product or attorney client withheld objections (where appropriate), and further responses to interrogatories 2, 3, 7 and 8, and requests for production of documents numbers 1 to 24, and 26 to 54, without non privilege objections within (10) days, along with all responsive documents, and a privilege log if applicable, and for entry of the Protective Order with Plaintiff's compromise regarding maintaining documents, post litigation, the parties' joint stipulation, declarations and supporting exhibits, and good cause appearing, the Court makes the following Order:

12 Plaintiff's motion to compel further responses by defendants Nelk, Inc., Nelk
13 USA, Inc., Metacard, LLC, Kyle Forgeard and John Shahidi (collectively,
14 "Defendants") is hereby GRANTED in its entirety.

15 Defendants shall provide amended further responses to interrogatories 2, 3,
16 7 and 8, and requests for production of documents numbers 1 to 24, and 26 to 54,
17 without non privilege objections within (10) days, any privilege log (for attorney
18 client or attorney work product privilege), along with all responsive documents.

19 Plaintiff shall provide a clean version of the proposed Protective Order with
20 Plaintiff's language to compromise regarding maintaining documents post
21 litigation for entry by this Court.

23 | IT IS SO ORDERED.

25 DATED: . 2025

**Hon. Douglas F. McCormick
United States Magistrate Judge**